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September 11, 2025

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Steven I. Locke, U.S.M.J.
100 Federal Plaza, Courtroom 820
Central Islip, NY 11722-4438

Re: Cardenas v. Vinny's General Contracting Inc., et ano.
Case No.: 2:25-cv-1248 (SIL)

Dear Judge Locke:

This firm represents the Plaintiff Alonso Cardenas ("Plaintiff") in the above-referenced case. Pursuant to the Court's Order dated September 10, 2025, the parties hereby submit the following joint status report.

The parties conducted their first mediation session on August 26, 2025. Good faith offers were exchanged and many issues discussed, but the parties did not come to a resolution as they reached impasse, which the parties believe can be overcome by the production of certain discovery from Plaintiff. The parties are meeting-and-conferring regarding the discovery sought by Defendants, and intend to continue the mediation in a second session upon producing the aforesaid discovery.

Accordingly, the parties respectfully request an additional sixty (60) days to continue and complete their Mediation.

Separately, Plaintiff respectfully requests an adjournment of the status conference on Monday, September 15, 2025 at 11:45 AM, which is the date of the original conference.

The reason an adjournment is needed is because your undersigned has a court appearance in Brooklyn at 9:30 AM following by another court appearance in Queens at 12:00 PM. Defendants consent to this request. There have been prior adjournments of this status conference. The parties respectfully submit that the status conference be adjourned *sine die* pending the continued mediation such that alternative dates are unnecessary.

The parties respectfully submit that a proposed amended scheduling order is unnecessary at this time. For the foregoing reasons, Plaintiff respectfully submits that good cause exists for an adjournment. See Fed. R. Civ. P. 6(b)(1)(A).

The parties thank this honorable Court for its time and attention to this case.

Dated: Jamaica, New York
September 11, 2025

Respectfully submitted,

SAGE LEGAL LLC

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